

DATE OUT: 04/NOV/09

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [☐]; MUP [☐]; EUP [☒]

BARCODE NO.: 371136

REG./FILE SYMBOL NO.: 65109-1

PRODUCT NAME: Coperlate

MRID NO.: 477966-01

COMPANY NAME: SSI Corporation

ACTION CODE: 675

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INTRODUCTION:

With this resubmission, SSI Corporation provided additional product chemistry data pertaining to the Storage Stability and Corrosion Characteristics of the product. The registrant is requesting reregistration of EPA Reg. No. 65109-1.

FINDINGS:

1. EPA Reg. No. 65109-1 is an end-use algacide/bactericide produced through a non-integrated formulation process and contains 20% Copper Sulfate Pentahydrate from a registered technical grade active ingredient source.
2. The storage stability of the test product (in translucent polyethylene containers) was evaluated for a period of one year at $20^{\circ}\text{C} \pm 2^{\circ}\text{C}$ temperature. The study was conducted in compliance with the Good Laboratory Practice (GLP) standards. The active ingredient concentrations were determined initially, and after 3, 6, 9, and 12 months of storage using UV spectrophotometry method. At least two replicate analyses were performed at each time interval.

The corrosion potential of the test substance to its container was also assessed. Two coupons were cut from the containers and were cleaned, dried and weighed for a baseline measurement, then stored completely submerged in the test substance. At the end of each storage phase, physical changes in the product and container were observed and recorded.

Results:

Observation Period (months)	Percent Active Ingredient	% Variation from Label Claim (19.8%)	% Variation from Baseline
0	20.39	2.98	N/A
3	20.36	2.83	-0.15
6	20.39	2.98	0.00
9	20.46	3.33	0.34
12	19.74	-0.30	-3.19

The test substance exhibited analytically only slight variations in active ingredient percentages. Therefore, the test substance was analytically stable and showed no signs of deterioration. No changes to the physical appearance of the test substance were observed and no corrosion of the test container occurred throughout the study.

3. The Ingredients statements are in compliance with the requirements of 40 CFR 156.10(g) and PR Notice 91-2. There are no data present that trigger the Physical or Chemical Hazards statements on the label. The Storage and Disposal statements are acceptable per 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3. We recommend removing the word "Prohibited" under the Storage and Disposal heading and also placing the entire Storage and Disposal section in a text box for added prominence.

CONCLUSIONS:

The submitted studies on Storage Stability and Corrosion Characteristics of the product satisfy the requirements under 40 CFR 158.190 corresponding to GRNs 830.6317 and 830.6320, respectively.

The registrant has now satisfied the product chemistry data requirements for the reregistration of EPA Reg. 65109-1.